

**Response to Question 14:**

The name, address, citizenship, and principal businesses of SKE's ten percent or greater direct and indirect shareholders or other equity holders, and the percentage of equity owned by each shareholder are as follows:

Name: Earthlink, Inc.  
Address: 1375 Peachtree Street, N.E.  
Atlanta, GA 30309  
Citizenship: USA Corporation  
Principal Business: Information services  
Percentage Equity: 50% of SKE

Name: SK Telecom USA Holdings, Inc.  
Address: 1375 Peachtree Street, N.E.  
Atlanta, GA 30309  
Citizenship: USA Corporation  
Principal Business: Telecommunications  
Percentage Equity: 50% of SKE

Name: SK-Earthlink Management Corp.  
Address: Wilshire Blvd, 6<sup>th</sup> Floor,  
Los Angeles, CA, USA 90024  
Citizenship: USA (Delaware) Corporation  
Principal Business: Holding Company  
Percentage Equity: 2 membership units in SKE (<.01%)\*

\*SK-Earthlink Management Corp., which owns two out of 100,000,000 membership units in SKE, is owned 50% by SK Telecom USA Holdings, Inc. and 50% by Earthlink, Inc. These indirect interests in SKE are included in the 50% respective interests listed for SK Telecom USA, Inc. and Earthlink, Inc., and are disclosed out of an abundance of caution given the role of SK-Earthlink Management Corp. as the entity responsible for the day-to-day management of SKE.

Earthlink, Inc. is a widely-held, publicly-traded company with no ten percent or greater shareholders.

The ten percent or greater direct and indirect shareholders of SK Telecom USA Holdings, Inc. are as follows:

Name: SK Telecom Co., Ltd.  
Address: 11, Euljiro, 2-ga, Jung-gu  
Seoul 100-999, Korea  
Citizenship: Korean Corporation  
Principal Business: Telecommunications  
Percentage Equity: 100% of SK Telecom USA Holdings, Inc.

Name: SK Corporation  
Address: 99, Seolin-dong, Jongro-gu  
Seoul 110-728, Korea  
Citizenship: Korean Corporation  
Principal Business: Petroleum and coal products, manufacturing  
Percentage Equity: 21.47% of SK Telecom

Name: Citibank ADR  
Address: 399 Park Avenue  
New York, NY 10022  
Citizenship: USA Corporation  
Principal Business: Financial Services  
Percentage Equity: 27.36% of SK Telecom

Name: SK Telecom Co., Ltd.  
Address: 11, Euljiro, 2-ga, Jung-gu  
Seoul 100-999, Korea  
Citizenship: Korean Corporation  
Principal Business: Telecommunications  
Percentage Equity: 10.53% of SK Telecom

**Response to Question 15:**

Section 63.18

- (d) SKE has not previously received authorization under Section 214 of the Act.
- (e)(3) SKE certifies that it will comply with the conditions contained in Sections 63.21, 63.22 and 63.23 of the Commission's Rules.
- (g) An authorization of the facilities for which authority is sought is categorically excluded as defined by 47 CFR §1.1306.